

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001

03 MDL 1570 (RCC)
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THIS DOCUMENT RELATES TO:

***THOMAS E. BURNETT, SR., ET AL. VS. AL BARAKA
INVESTMENT AND DEVELOPMENT CORP., ET AL.
03 CV 9849 (RCC); 03 CV 5738 (RCC)***

**DECLARATION OF JODI WESTBROOK FLOWERS IN SUPPORT OF PLAINTIFFS'
MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANT JAMAL KHALIFA'S MOTION
TO DISMISS WITH SUPPORTING POINTS AND AUTHORITIES**

JODI WESTBROOK FLOWERS declares under penalty of perjury:

1. I am attorney admitted to practice *pro hac vice* before this Court and am a member of MOTLEY RICE LLC, counsel for plaintiffs in *Burnett, et al. v. Al Baraka Investment & Development Corp., et al.*, Civil Action Nos. 03 CV 9849 and 03 CV 5738. I submit this declaration to provide the Court with the exhibits on which Plaintiffs rely in their Memorandum of Law in Opposition to Jamal Khalifa's Motion to Dismiss with Supporting Points and Authorities.

2. Exhibit 1 is a true and accurate copy of a pleading by the United States Department of Justice, before the Board of Immigration Appeals captioned "Government's Response Brief in Support of Decision of the Immigration Judge Denying Respondent Bond," dated March 10, 1995.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 4, 2004.



JODI WESTBROOK FLOWERS